

**INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and**

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL
SERVICES**

**NEW SOURCE CONSTRUCTION PERMIT
and
MINOR SOURCE OPERATING PERMIT**

**Harding Group dba SPG Graphics
4623 West 78th Street
Indianapolis, Indiana 46268**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-15462-00346

Issued by:

Originally signed by John B. Chavez

John B. Chavez, Administrator
Office of Environmental Services

Issuance Date: 9-16-2003

Expiration Date: 9-16-2008

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
- A.2 Emission Units and Pollution Control Equipment Summary

B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions
- B.3 Effective Date of the Permit [IC 13-15-5-3]
- B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]
- B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]
- B.6 Modification to Permit [326 IAC 2]
- B.7 Minor Source Operating Permit [326 IAC 2-6.1]
- B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]
- B.9 Preventive Maintenance Plan [326 IAC 1-6-3]
- B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]
- B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-30-3-1]
- B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
- B.13 Annual Fee Payment [326 IAC 2-1.1-7]

C SOURCE OPERATION CONDITIONS

- C.1 Permit Revocation [326 IAC 2-1-9]
- C.2 Opacity [326 IAC 5-1]
- C.3 Asbestos Abatement Projects [326 IAC 14-10][326 IAC 18][40 CFR 61, Subpart M]
- C.4 Performance Testing [326 IAC 3-6]
- C.5 Compliance Requirements [326 IAC 2-1.1-11]
- C.6 Compliance Monitoring [326 IAC 2-1.1-11]
- C.7 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]
- C.8 Compliance Response Plan - Preparation and Implementation

Record Keeping and Reporting Requirements

- C.9 Malfunctions Report [326 IAC 1-6-2]
- C.10 Annual Emission Statement [326 IAC 2-6]
- C.11 General Record Keeping Requirements [326 IAC 2-6.1-2]
- C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

D.1 FACILITY OPERATION CONDITIONS - Printing Presses

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds and Major Sources of Hazardous Air Pollutants [326 IAC 8-1-6 and 2-4.1]

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

- D.1.2 Record Keeping Requirements

Annual Notification

Malfunction Report

Affidavit of Construction

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a printing press.

Authorized Individual: President
Source Address: 4923 West 78th Street, Indianapolis, IN 46268
Mailing Address: 4923 West 78th Street, Indianapolis, IN 46268
General Source Phone: (317)876-3398
SIC Code: 2731
County Location: Marion
Source Location Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act
Not one of the 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.
- (b) One (1) Sheetfed Lithographic Press, identified as Itek 3985 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 12 inches X 18 inches.
- (c) One (1) Sheetfed Lithographic Press, identified as Ryobi 522 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 14.38 inches X 20.5 inches.
- (d) One (1) Sheetfed Lithographic Press, identified as Shinohara 66IIP 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 19 inches X 26 inches.

This stationary source is also approved to operate the following emissions units and pollution control devices:

- (e) One (1) Sheetfed Lithographic Press, identified as new 5-Color, with a maximum line speed of 666 feet per minute and a maximum printing width of twenty-eight (28) inches, and exhausting at a stack, identified as Stack 3.
- (f) One (1) Sheetfed Lithographic Press, identified as 4 Color with a maximum line speed of 390 feet per minute and a maximum printing width of nineteen (19) inches.

- (g) One (1) Sheetfed Lithographic Press, identified as 5 Color with a maximum line speed of 425 feet per minute and a maximum printing width of nineteen (19) inches, exhausting at a stack, identified as Stack 2.
- (h) One (1) Sheetfed Lithographic Press, identified as 6 Color with a maximum line speed of 467 feet per minute and a maximum printing width of twenty (20) inches, exhausting at a stack, identified as Stack 1.
- (i) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.
- (j) One (1) Web nonheatset Lithographic Press, identified as Web 6 Color, with a maximum line speed of 550 feet per minute and a maximum printing width of 17.5 inches.
- (k) One (1) Lithographic Envelope Press, identified as Halm Jet Press, with a maximum line speed of 1000 envelopes per minute and a maximum printing width of ten (10) envelopes.
- (l) One (1) Sheetfed Lithographic Press, identified as GTOZ, with a maximum line speed of 222 feet per minute and a maximum printing width of fourteen (14) inches.
- (m) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct and operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

- (a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.
 - (1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.
 - (2) If actual construction of the emission units differs from the construction

proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

- (b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.
- (d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

And

Office of Environmental Services
Air Quality Management Section

Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and Indianapolis OES on or before the date it is due.

B.9 Preventive Maintenance Plan [326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ and Indianapolis OES upon request and within a reasonable time, and shall be subject to review and approval by

IDEM, OAQ and Indianapolis OES. IDEM, OAQ and Indianapolis OES may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit.

The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.10 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.11 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2]
[IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, Indianapolis OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.12 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM,

OAQ, Permits Branch and Indianapolis OES, within thirty (30) days of the change.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ and Indianapolis OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.13 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and Indianapolis OES, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:

- (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.4 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and Indianapolis OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ and Indianapolis OES if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.5 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.6 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.7 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or

other approved methods as specified in this permit.

C.8 Compliance Response Plan - Preparation and Implementation

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) under 40 CFR 60/63, such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ and Indianapolis OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan), the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) to include such response steps taken.

The OMM Plan (or Parametric Monitoring and SMM Plan) shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan); or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan (or Parametric Monitoring Plan and Start-up, Shutdown, and Malfunction (SSM) Plan) is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the

results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall be considered a deviation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.9 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and

usual manner. [326 IAC 1-2-39]

C.10 Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate estimated actual emissions of regulated pollutants (as defined by 326 IAC 2-7-1(32) "Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- And
- Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and Indianapolis OES on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.11 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner and Indianapolis OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and Indianapolis OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.12 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Office of Environmental Services
Air Quality Management Section
Compliance Data Group
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and Indianapolis OES on or before the date it is due.
- (c) Unless otherwise specified in this permit, any report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Printing Press operation consisting of the following:

- (a) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.
- (b) One (1) Sheetfed Lithographic Press, identified as Itek 3985 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 12 inches X 18 inches.
- (c) One (1) Sheetfed Lithographic Press, identified as Ryobi 522 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 14.38 inches X 20.5 inches.
- (d) One (1) Sheetfed Lithographic Press, identified as Shinohara 66IIP 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 19 inches X 26 inches.
- (e) One (1) Sheetfed Lithographic Press, identified as new 5-Color, with a maximum line speed of 666 feet per minute and a maximum printing width of twenty-eight (28) inches, and exhausting at a stack, identified as Stack 3.
- (f) One (1) Sheetfed Lithographic Press, identified as 4 Color with a maximum line speed of 390 feet per minute and a maximum printing width of nineteen (19) inches.
- (g) One (1) Sheetfed Lithographic Press, identified as 5 Color with a maximum line speed of 425 feet per minute and a maximum printing width of nineteen (19) inches, exhausting at a stack, identified as Stack 2.
- (h) One (1) Sheetfed Lithographic Press, identified as 6 Color with a maximum line speed of 467 feet per minute and a maximum printing width of twenty (20) inches, exhausting at a stack, identified as Stack 1.
- (i) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.
- (j) One (1) Web nonheatset Lithographic Press, identified as Web 6 Color, with a maximum line speed of 550 feet per minute and a maximum printing width of 17.5 inches.
- (k) One (1) Lithographic Envelope Press, identified as Halm Jet Press, with a maximum line speed of 1000 envelopes per minute and a maximum printing width of ten (10) envelopes.
- (l) One (1) Sheetfed Lithographic Press, identified as GTOZ, with a maximum line speed of 222 feet per minute and a maximum printing width of fourteen (14) inches.
- (m) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compounds and Major Sources of Hazardous Air Pollutants [326 IAC 8-1-6 and 2-4.1]

- (a) Any change or modification which will increase the potential to emit from the presses of Volatile Organic Compounds (VOCs) to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and OES, and shall be subject to 326 IAC 8-1-6.

- (b) Any change or modification which will increase the potential to emit from the presses of a single Hazardous Air Pollutant (HAP) to ten (10) tons per year or a combination of Hazardous Air Pollutants (HAPs) to twenty-five (25) tons per year or more shall obtain prior approval from IDEM, OAQ and OES, and shall be subject to 326 IAC 2-4.1.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.2 Record Keeping Requirements

To document compliance with Condition D.1.1, the Permittee shall maintain records of the VOC content and the quantity of each coating material and solvent used and the HAP content and the quantity of each coating material and solvent used.

MINOR SOURCE OPERATING PERMIT ANNUAL NOTIFICATION

MSOP #:097-15462-00346

9 not in compliance with the requirements of MSOP 097-15462-00346.

Date:

Noncompliance:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
FAX NUMBER - 317 327-2274**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? _____, 25 TONS/YEAR SULFUR DIOXIDE ? _____, 25 TONS/YEAR NITROGEN OXIDES? _____, 25 TONS/YEAR VOC ? _____, 25 TONS/YEAR HYDROGEN SULFIDE ? _____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? _____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? _____, 25 TONS/YEAR FLUORIDES ? _____, 100TONS/YEAR CARBON MONOXIDE ? _____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? _____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? _____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? _____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? _____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Harding Group dba SPG Graphics PHONE NO. (317) 876-3355
LOCATION: INDIANAPOLIS, MARION COUNTY
PERMIT NO. 097-15462 AFS PLANT ID: 00346 AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Mail to: Air Quality Management Section
Indianapolis Office of Environmental Services
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

Harding Group dba SPG Graphics.
4623 West 78th Street
Indianapolis, Indiana 46268

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for Harding Group dba SPG Graphics
3. By virtue of my position with Harding Group dba SPG Graphics, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of Harding Group dba SPG Graphics.
4. I hereby certify that ,Harding Group dba SPG Graphics has constructed the the following:
 - (a) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.
 - (b) One (1) Sheetfed Lithographic Press, identified as Itek 3985 2-color press, with a maximum speed of 8000 sheets per and a maximum sheet size of 12 inches X 18 inches.
 - (c) One (1) Sheetfed Lithographic Press, identified as Ryobi 522 2-color press, with a maximum speed of 8000 sheets per and a maximum sheet size of 14.38 inches X 20.5 inches.
 - (d) One (1) Sheetfed Lithographic Press, identified as Shinohara 66IIP 2-color press, with a maximum speed of 8000 sheets per and a maximum sheet size of 19 inches X 26 inchesin conformity with the requirements and intent of the Minor Source Operating Permit(MSOP) application received by the Indianapolis Office of Environmental Services on July 25, 2003 and as permitted pursuant to **MSOP 097-15462-00346** issued on _____.

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

Signature

Date

STATE OF INDIANA)
)SS

COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State
of Indiana on this _____ day of _____, 20 _____.
My Commission expires: _____

Signature

Name (typed or printed)

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

**Addendum to the
Technical Support Document for a Minor Source Operating Permit**

Source Background and Description

Source Name:	SPG Graphics, Inc.
Source Location:	4923 West 78th Street, Indianapolis, IN 46268
County:	Marion
SIC Code:	2731
Operation Permit No.:	097-15462-00346
Permit Reviewer:	Keshav Reddy

On August 5, 2003, the Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that SPG Graphics, Inc. had applied for a Minor source operating permit to the operation of its printing press. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The following changes to the draft Title V Permit will be made. The TSD will remain as it originally appeared when published. OAQ and OES prefer that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the permit has been published are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment 1:

There has been an ownership change for SPG Graphics, Inc. The name has been changed to Harding Group dba SPG Graphics.

Response to Comment 1:

The cover page and pages throughout the Permit have been updated to reflect name change where necessary.

**Indiana Department of Environmental Management
Office of Air Quality
and
Indianapolis Office of Environmental Services**

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: SPG Graphics, Inc.
Source Location: 4923 West 78th Street, Indianapolis, IN 46268
County: Marion
SIC Code: 2731
Operation Permit No.: 097-15462-00346
Permit Reviewer: Keshav Reddy

The Indiana Department of Environmental Management, Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed an application from SPG Graphics, Inc. relating to the operation of its printing press.

New Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.
- (b) One (1) Sheetfed Lithographic Press, identified as Itek 3985 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 12 inches X 18 inches.
- (c) One (1) Sheetfed Lithographic Press, identified as Ryobi 522 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 14.38 inches X 20.5 inches.
- (d) One (1) Sheetfed Lithographic Press, identified as Shinohara 66IIP 2-color press, with a maximum speed of 8000 sheets per hour and a maximum sheet size of 19 inches X 26 inches.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (e) One (1) Sheetfed Lithographic Press, identified as new 5-Color, with a maximum line speed of 666 feet per minute and a maximum printing width of twenty-eight (28) inches, and exhausting at a stack, identified as Stack 3.
- (f) One (1) Sheetfed Lithographic Press, identified as 4 Color with a maximum line speed of 390 feet per minute and a maximum printing width of nineteen (19) inches.

- (g) One (1) Sheetfed Lithographic Press, identified as 5 Color with a maximum line speed of 425 feet per minute and a maximum printing width of nineteen (19) inches, exhausting at a stack, identified as Stack 2.
- (h) One (1) Sheetfed Lithographic Press, identified as 6 Color with a maximum line speed of 467 feet per minute and a maximum printing width of twenty (20) inches, exhausting at a stack, identified as Stack 1.
- (i) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches.
- (j) One (1) Web nonheatset Lithographic Press, identified as Web 6 Color, with a maximum line speed of 550 feet per minute and a maximum printing width of 17.5 inches.
- (k) One (1) Lithographic Envelope Press, identified as Halm Jet Press, with a maximum line speed of 1000 envelopes per minute and a maximum printing width of ten (10) envelopes.
- (l) One (1) Sheetfed Lithographic Press, identified as GTOZ, with a maximum line speed of 222 feet per minute and a maximum printing width of fourteen (14) inches.

Unpermitted Emission Units and Pollution Control Equipment

- (m) One (1) Sheetfed Lithographic Press, identified as QMDI with a maximum line speed of 252 feet per minute and a maximum printing width of 13.375 inches

Emission Units and Pollution Control Equipment Removed From Service

- (a) One (1) Web nonheatset Lithographic Press, identified as Web 4 Color with a maximum line speed of 550 feet per minute and a maximum printing width of 17.5 inches.
- (b) One (1) Sheetfed Lithographic Press, identified as Hamada, with a maximum line speed of 236 feet per minute and a maximum printing width of eleven (11) inches.
- (c) One (1) Sheetfed Lithographic Press, identified as Multilith 1, with a maximum line speed of 236 feet per minute and a maximum printing width of eleven (11) inches.
- (d) One (1) Sheetfed Lithographic Press, identified as Multilith2, with a maximum line speed of 236 feet per minute and a maximum printing width of eleven (11) inches.
- (e) One (1) Sheetfed Lithographic Press, identified as KORD, with a maximum line speed of 193 feet per minute and a maximum printing width of eighteen (18) inches.
- (f) One (1) Sheetfed Lithographic Press, identified as AB Dick, with a maximum line speed of 236 feet per minute and a maximum printing width of eleven (11) inches.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 5311-01, issued on May 18,1995

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

- (a) IDEM, OAQ and OES are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support

Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

- (b) IDEM, OAQ and OES are reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1	Sheetfed lithographic press identified as 6-Color	27	1 foot	500	70
2	Sheetfed lithographic press identified as 5-Color	27	0.5 feet	na	70
3	Sheetfed lithographic press identified as new 5-Color	27	1 foot	500	70

Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on Feb. 28, 1997 and additional information received on June 3, 1998 and June 25, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (7 Pages).

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2002 OES emission data.

Pollutant	Actual Emissions (tons/year)
PM	Not Reported
PM-10	Not Reported
SO ₂	Not Reported
VOC	19.9
CO	Not Reported
NO _x	Not Reported
HAP (specify)	Not Reported

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	---
PM-10	---
SO ₂	---
VOC	69.79
CO	---
NO _x	---

HAP's	Potential To Emit (tons/year)
Glycol Ethers	0.168
Xylene	2.76
Methanol	6.14
Toluene	1.59
Methyl Ethyl Ketone	0.26
TOTAL	10.918

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for the other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Source Status

Existing Source PSD definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	---
PM10	---
SO ₂	---
VOC	53.41
CO	---
NO _x	---
HAP	10.918

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

- a) New Source Performance Standards (326 IAC 12) and 40 CFR Part 63:

40 CFR, § 60.430, Subpart QQ - Standards of Performance for the Graphic Arts Industry : Publication Rotogravure Printing : This standard applies to each publication rotogravure printing press, that commences construction, modification or reconstruction after October 28, 1980.

The eleven (11) lithographic presses located at the source are not subject to the NSPS, because they are not rotogravure printing presses.

- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR, § 63.820, Subpart KK - National Emission Standards for the Printing and Publishing Industry: This standard applies to major source of hazardous air pollutants (HAPs), at which publication rotogravure, product and packaging rotogravure or wideweb flexographic printing presses are operated.

The eleven (11) sheet-fed lithographic presses, located at the source are not subject to the NESHAP, because they are not publication, product and packaging rotogravure printing presses, nor they are wide-web flexographic printing presses, and they are not major for single HAP and combined HAPs.

- (c) National Emission Standards for Hazardous Air Pollutants (NESHAPs)

40 CFR, § 63.3290, Subpart JJJJ - National Emission Standards for Paper and other Web Coating Industry: This standard applies to major source of hazardous air pollutants (HAPs),

at which coating of folding paper board boxes, packing paper, label, medical tape, foil, commercial printing, etc. takes place.

The eleven (11) sheet-fed lithographic presses, located at the source are not subject to the NESHAP, because the source is not major for single HAP and combined HAPs and web coating in lithography is specifically exempted by § 63.3300(c).

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source was a minor source when it was built in 1996 and is not in one (1) of the twenty-eight (28) listed source categories. This source has been modified since its construction. However, the potential to emit of each criteria pollutant from the entire source is less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 are not applicable.

326 IAC 2-4.1-1 (New Source Toxics Control)

The existing facilities are not subject to the provisions of 326 IAC 2-4.1 because they were constructed prior to the July 27, 1997 (in May 1996), the applicability date for this rule. Further, the addition of new presses are also not subject to this rule because this source is not major for single HAP nor is it major for combined HAPs.

326 IAC 2-5.1-3 (Permits) and 326 IAC 2-6.1 (Minor Source Operating Permit)

This source is subject to the requirements to obtain a minor source operating permit under 326 IAC 2-6.1 because it is an existing source with a potential to emit of Volatile Organic Compounds (VOC) greater than 25 tons per year.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to all facilities constructed after January 1, 1980 and that have a potential to emit 25 tons or more per year of VOC emissions and not regulated by other 326 IAC 8 provisions. There are no facilities at this source that have a potential to emit 25 or more tons per year of VOC emissions, and hence this rule is not applicable.

326 IAC 8-2-5 (Paper Coating Operations)

This rule does not apply to this source, since no web coating or saturation processes are used.

326 IAC 8-5-5 (Miscellaneous Operations: Graphic Arts Operations)

This rule applies to packaging rotogravure; publication rotogravure; and flexographic printing sources. The eleven (11) sheet-fed lithographic presses are not subject to this rule, because they are not publication, product and packaging rotogravure printing presses nor they are flexographic printing presses.

326 IAC 8-6-1 (Organic Solvent Emissions Limitation)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties with potential VOC emissions of 100 tons per year or greater, not limited by other rules in article 8. This rule also applies to sources located anywhere in the state commencing operation after October 7, 1974, and prior to January 1, 1980 with potential VOC emissions of 100 tons per year or greater. This rule is not applicable to the source, because its VOC potential emissions of 69.79 tons per year is well below 100 tons per year and the existing facilities were constructed in May 1996 after January 1, 1980.

Conclusion

The operation of this printing presses shall be subject to the conditions of the attached proposed Minor Source Operating Permit 097-15462-00346.

VOC From Printing Press Operations

Company Name: SPG Graphics, Inc.
Street Address: 4923 West 78th Street, Indianapolis, IN 46268
County: Marion County
MSOP No. : 097-15462-00346
Reviewer: Keshav Reddy

Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin ² /Year)		
4 Color	390	19	46736.35		
Ink Name	Maximum Coverage (lbs/MMin ²)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin ² /Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	46736.352	0.58
Allied Four Star & Water	0.5	0.7	0	46736.352	0.08
Various Superior Cleaners	0.2	100	0	46736.352	4.67
Total VOC Emissions (tons/year) =					5.34
Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin ² /Year)		
5 Color	425	19	50930.64		
Ink Name	Maximum Coverage (lbs/MMin ²)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin ² /Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	50930.64	0.64
Emerald JRH,Water and Isop	0.5	7.68	0	50930.64	0.98
Various Superior Cleaners	0.2	100	0	50930.64	5.09
Total VOC Emissions =					6.71

Formula:

Max. line speed (feet/min.)* Max. print width (inches)* 12 inches * 60 min./hr * 8760 hrs/yr* 1/1000000 = throughput (Mmin²/yr)

Max. Coverage (lbs/Mmin²)* Wt. % Organics * (1-wt. % retained/100) * throughput (Mmin²/yr) = PTE (tons/yr)

VOC From Printing Press Operations

Company Name: SPG Graphics, Inc.
Street Address: 4923 West 78th Street, Indianapolis, IN 46268
County: Marion County
MSOP No. : 097-15462-00346
Reviewer: Keshav Reddy

Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin^2/Year)
6 Color	467	20	58909.25

Ink Name	Maximum Coverage (lbs/MMin^2)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin^2/Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	58909.248	0.74
Emerald JRH,Water and Isopropyl	0.5	7.68	0	58909.248	1.13
Various Superior Cleaners	0.2	100	0	58909.248	5.89
Coatings and Adhesives 1217B, BC, C	2.5	3	0	58909.248	2.21
Total VOC Emissions =					9.97

Press Id's	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin^2/Year)
QMDI (Two Units)	252	13.375	21258.42

Ink Name	Maximum Coverage (lbs/MMin^2)	Weight % Organic Volatiles	Wt% Rentention	ThroughPut (MMin^2/Year)	VOC Emissions (tons/year)
Superior Inks	2.5	20	95	21258.4176	0.27
Superior S-2918 Cleaner	0.0515	100	0	21258.4176	0.55
Total VOC Emissions fro					0.81
Total VOC Emissions fro					1.62

Formula:

Max. line speed (feet/min.) * Max. print width (inches) * 12 inches * 60 min./hr * 8760 hrs/yr * 1/1000000 = throughput (Mmin^2/yr)

Max. Coverage (lbs/Mmin^2) * Wt. % Organics * (1-wt. % retained/100) * throughput (Mmin^2/yr) = PTE (tons/yr)

VOC From Printing Press Operations

Company Name: SPG Graphics, Inc.
Street Address: 4923 West 78th Street, Indianapolis, IN 46268
County: Marion County
MSOP No. : 097-15462-00346
Reviewer: Keshav Reddy

Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin ² /Year)		
Web 6 Color	550	17.5	60706.80		
Ink Name	Maximum Coverage (lbs/MMin ²)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin ² /Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	60706.8	0.76
Allied Four Star, Water and Isopropyl	0.5	12.15	0	60706.8	1.84
Superior B-6336 Wash	0.2	70	0	60706.8	4.25
Total VOC Emissions (tons/year) =					6.85
Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin ² /Year)		
Halm Jet	1000	9	56764.80		
Ink Name	Maximum Coverage (lbs/MMin ²)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin ² /Year)	VOC Emissions (tons/year)
Ink	0.455	20	95	56764.8	0.13
Emerald JRH,Water and Isopropyl	0.091	16.83	0	56764.8	0.43
Various Superior Cleaners	0.0364	100	0	56764.8	1.03
Total VOC Emissions (tons/year) =					1.60

Formula:

Max. line speed (feet/min.) * Max. print width (inches) * 12 inches * 60 min./hr * 8760 hrs/yr * 1/1000000 = throughput (Mmin²/yr)

Max. Coverage (lbs/Mmin²) * Wt. % Organics * (1-wt. % retained/100) * throughput (Mmin²/yr) = PTE (tons/yr)

VOC From Printing Press Operations

Company Name: SPG Graphics, Inc.
Street Address: 4923 West 78th Street, Indianapolis, IN 46268
County: Marion County
MSOP No. : 097-15462-00346
Reviewer: Keshav Reddy

Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin²/Year)		
GTOZ	222	14	19602.78		
Ink Name	Maximum Coverage (lbs/MMin²)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin²/Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	19602.7776	0.25
Emerald JRH,Water and Isopropyl	0.5	0.52	0	19602.7776	0.03
Various Superior Cleaners	0.2	100	0	19602.7776	1.96
Total VOC Emissions (tons/year) =					2.23
Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin²/Year)		
2 Color Print Master	252	13.375	21258.42		
Ink Name	Maximum Coverage (lbs/MMin²)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin²/Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	21258.4176	0.27
Emerald JRH,Water and Isopropyl	0.5	7.68	0	21258.4176	0.41
Various Superior Cleaners	0.2	100	0	21258.4176	2.13
atings and Adhesives 1217B, BC,	2.5	3	0	21258.4176	0.80
Total VOC Emissions =					3.60

Max. line speed (feet/min.) * Max. print width (inches) * 12 inches * 60 min./hr * 8760 hrs/yr * 1/1000000 = throughput (Mmin²/yr)

Max. Coverage (lbs/Mmin²) * Wt. % Organics * (1-wt. % retained/100) * throughput (Mmin²/yr) = PTE (tons/yr)

VOC From Printing Press Operations**Company Name:** SPG Graphics, Inc.**Street Address:** 4923 West 78th Street, Indianapolis, IN 46268**County:** Marion County**MSOP No. :** 097-15462-00346

Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin²/Year)		
Ryobi 522 2 Color Press	160.8	20.5	20791.05		
Ink Name	Maximum Coverage (lbs/MMin²)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin²/Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	20791.05	0.26
Emerald JRH,Water and Isopropyl	0.5	7.68	0	20791.05	0.40
Various Superior Cleaners	0.2	100	0	20791.05	2.08
Coatings and Adhesives 1217B, BC, C	2.5	3	0	20791.05	0.78
Total VOC Emis:					3.52
Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin²/Year)		
Shinohara 6611P 2 Color Press	212	26	34765.29		
Ink Name	Maximum Coverage (lbs/MMin²)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin²/Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	34765.29	0.43
Emerald JRH,Water and Isopropyl	0.5	7.68	0	34765.29	0.67
Various Superior Cleaners	0.2	100	0	34765.29	3.48
Coatings and Adhesives 1217B, BC, C	2.5	3	0	34765.29	1.30
Total VOC Emis:					5.88

VOC From Printing Press Operations

Company Name: SPG Graphics, Inc.
Street Address: 4923 West 78th Street, Indianapolis, IN 46268
County: Marion County
MSOP No. : 097-15462-00346
Reviewer: Keshav Reddy

Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin^2/Year)		
ITEK 3985	134	18	15212.97		
Ink Name	Maximum Coverage (lbs/MMin^2)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin^2/Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	15212.97	0.19
Emerald JRH,Water and Isopropyl	0.5	7.68	0	15212.97	0.29
Various Superior Cleaners	0.2	100	0	15212.97	1.52
Coatings and Adhesives 1217B, BC	2.5	3	0	15212.97	0.57
Total VOC Emissions =					2.57
Press Id	Maximum Line Speed (Feet/Minute)	Maximum Print Width (Inches)	ThroughPut (MMin^2/Year)		
5 Color	666	28	117616.67		
Ink Name	Maximum Coverage (lbs/MMin^2)	Weight % Organic Volatiles	Weight% Substrate	ThroughPut (MMin^2/Year)	VOC Emissions (tons/year)
Ink	2.5	20	95	117616.6656	1.47
Emerald JRH,Water and Isopropyl	0.5	7.68	0	117616.6656	2.26
S-2936	0.05	100	0	117616.6656	2.94
S-2918	0.05	100	0	117616.6656	2.94
EC-540	0.05	100	0	117616.6656	2.94
B-6336	0.05	100	0	117616.6656	2.94
Coatings & Adhesives 1217B, BC	2.5	3	0	117616.6656	4.41
Total VOC Emissions (tons/year) =					19.90

Formula:

Max. line speed (feet/min.) * Max. print width (inches) * 12 inches * 60 min./hr * 8760 hrs/yr * 1/1000000 = throughput (Mmin^2/yr)

Max. Coverage (lbs/Mmin^2) * Wt. % Organics * (1-wt. % retained/100) * throughput (Mmin^2/yr) = PTE (tons/yr)

Summary of Potential to Emit

Company Name: SPG Graphics, Inc.
Street Address: 4923 West 78th Street, Indianapolis, IN 46268
County: Marion County
MSOP No. : 097-15462-00436
Reviewer: Keshav Reddy

Press ID	VOC Emissions (tons/year)
4 Color	5.34
5 Color	6.71
6 Color	9.97
QMDI	0.81
QMDI (Proposed)	0.81
Web 6 Color	6.85
Halm Jet Press	1.6
GTOZ	2.23
2-Color Print Master	3.6
Ryobi 522 2-Color Press	3.52
Shinohara 6611P 2 Color	5.88
ITEK 3985 2-Color Press	2.57
5 Color (New)	19.9
Total VOC Emissions (tons/year) =	69.79

HAP EMISSIONS	HAP Emissions (tons/year)
Glycol Ethers	0.17
Xylene	2.76
Methanol	6.14
Toluene	1.59
Methyl Ethyl Ketone	0.26
Total HAP Emissions (tons/year) =	10.92